

BARBARA HILDEBRANDT v. HYATT CORPORATION, ET AL.

- APPENDIX -

<u>Exhibit #</u>	<u>Document Description</u>
Ex. A	E-mails between Natalie Storch, Robert Steinberg and Theresa Gallion dated March 26, 2004
Ex. B	E-mail from Theresa Gallion dated March 30, 2004
Ex. C	E-mails between Robert Steinberg and Theresa Gallion dated March 30, 2004
Ex. D	Facsimile coversheet dated March 5, 2003 from Robert Steinberg enclosing Dr. Rosen's report
Ex. E	Letter dated March 3, 2003 from Robert Steinberg enclosing Dr. Parson's report
Ex. F	Cover page of Dr. Rosen's report
Ex. G	Dr. Parson's report
Ex. H	Letter dated February 3, 2004 from Robert Steinberg regarding plaintiff's expert reports
Ex. I	Letter dated March 2, 2004 from Natalie Storch regarding defendants' expert report

Robert A. Steinberg

From: Gallion, Theresa [tgallion@laborlawyers.com]
Sent: Friday, March 26, 2004 4:47 PM
To: Storch, Natalie; Robert A. Steinberg
Subject: RE: Hildebrandt v. Hyatt Deposition Dates

I will be cheering for Xavier too, as well as all the Cinderellas. I know you are busy, but we are only asking for a brief extension of the rebuttal expert deadline. Please let us have your agreement to such a brief extension on Monday. Have a nice weekend.

Theresa

-----Original Message-----

From: Storch, Natalie
Sent: Friday, March 26, 2004 4:39 PM
To: 'Robert A. Steinberg'
Cc: Gallion, Theresa
Subject: RE: Hildebrandt v. Hyatt Deposition Dates

Dear Bob:

We will touch base with you on Monday. Have a good weekend, too. I will be cheering for Xavier.

Natalie

-----Original Message-----

From: Robert A. Steinberg [mailto:bobsteinberg@wsbclaw.com]
Sent: Friday, March 26, 2004 4:43 PM
To: Storch, Natalie
Subject: RE: Hildebrandt v. Hyatt Deposition Dates

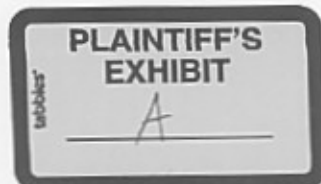
Yes, I oppose it. You have already filed an expert report. But, I am willing to discuss. Just not on Friday evening.

Have a nice weekend.

Root for Xavier in the NCAA tournament tonight

Robert A. Steinberg
Waite, Schneider, Bayless & Chesley Co., L.P.A.
1513 Fourth & Vine Tower
One West Fourth Street
Cincinnati, OH 45202
bobsteinberg@wsbclaw.com

513-621-0267



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-----Original Message-----

From: Storch, Natalie [mailto:nstorch@laborlawyers.com]

Sent: Friday, March 26, 2004 3:53 PM

To: Robert A. Steinberg

Cc: Gallion, Theresa; Jeffrey J. Harmon

Subject: RE: Hildebrandt v. Hyatt Deposition Dates

Dear Bob:

Is this "yes" you have opposition, or "yes" you would consent to such an extension?

NATALIE J. STORCH
FISHER & PHILLIPS LLP
Lincoln Plaza, Suite 1250
300 South Orange Avenue
Orlando, Florida 32801-3392
Direct Dial - (407) 541-0883
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-----Original Message-----

From: Robert A. Steinberg [mailto:bobsteinberg@wsbclaw.com]

Sent: Friday, March 26, 2004 3:51 PM

To: Storch, Natalie

Subject: RE: Hildebrandt v. Hyatt Deposition Dates

Yes

Robert A. Steinberg
Waite, Schneider, Bayless & Chesley Co., L.P.A.
1513 Fourth & Vine Tower

One West Fourth Street
Cincinnati, OH 45202
robsteinberg@wsbclaw.com

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-----Original Message-----

From: Storch, Natalie [<mailto:nstorch@laborlawyers.com>]

Sent: Friday, March 26, 2004 3:44 PM

To: Robert A. Steinberg

Cc: Gallion, Theresa

Subject: RE: Hildebrandt v. Hyatt Deposition Dates

Dear Bob:

We likely will file a motion with the court to extend the deadline to identify rebuttal experts for 10 to 15 days from our early April deadline. Do you have any opposition to such an extension?

Also, if you have potential dates next week for Dr. Rosen, we will reschedule his deposition. Thank you, and have a good weekend.

NATALIE J. STORCH
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300 South Orange Avenue
Orlando, Florida 32801-3392
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Robert A. Steinberg

From: Lopez, Martha [mlopez@laborlawyers.com]
Sent: Tuesday, March 30, 2004 8:50 AM
To: bobsteinberg@wsbclaw.com
Cc: Gallion, Theresa; Storch, Natalie
Subject: HILDEBRANDT/HYATT CORPORATION MATTER

SENT ON BEHALF OF THERESA M. GALLION

Dear Bob:

It is unfortunate you have not responded to our requests that you consent to the relief sought in the attached motion. If we have not heard from you by 1:00 P.M. today, we will file the attached motion. Please reconsider your inexplicable lack of cooperation. Thank you. **Theresa Gallion.**

Marti Lopez

Legal Assistant to

Theresa M. Gallion

William E. Grob

FISHER & PHILLIPS LLP

1250 Lincoln Plaza

300 S. Orange Avenue

Orlando, Florida 32801

407-541-0853 (Direct Dial)

407-541-0887 (Fax)

Mlopez@laborlawyers.com

www.laborlawyers.com



Robert A. Steinberg

From: Gallion, Theresa [tgallion@laborlawyers.com]
Sent: Tuesday, March 30, 2004 10:17 AM
To: Robert A. Steinberg
Cc: Storch, Natalie
Subject: RE: Hildebrandt v. Hyatt Deposition Dates

Thanks Bob. We will file the motion today noting your previous opposition. It would be disrespectful of the Court's time to delay filing the motion. Thank you.

Theresa

-----Original Message-----

From: Robert A. Steinberg [mailto:bobsteinberg@wsbclaw.com]
Sent: Tuesday, March 30, 2004 10:08 AM
To: Gallion, Theresa
Subject: RE: Hildebrandt v. Hyatt Deposition Dates

Theresa:

I am presently completing a brief in a major case that must be file today; therefore I cannot drop what I am doing to discuss this. I can talk late today or sometime tomorrow.

Bob

Robert A. Steinberg
Waite, Schneider, Bayless & Chesley Co., L.P.A.
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-----Original Message-----

From: Gallion, Theresa [mailto:tgallion@laborlawyers.com]
Sent: Tuesday, March 30, 2004 9:51 AM
To: Robert A. Steinberg
Cc: Storch, Natalie
Subject: RE: Hildebrandt v. Hyatt Deposition Dates



Bob,

You have seen the motion. Is there anything you feel we need to discuss before deciding, with finality, to oppose it or assent to it? If so, I am sitting at my desk all morning; feel free to call me at 407 541 0880. If I do not hear from you by 1 p.m, we will file the motion and indicate you are opposed. Thanks for your cooperation.

Theresa

-----Original Message-----

From: Robert A. Steinberg [mailto:robsteinberg@wsbclaw.com]

Sent: Tuesday, March 30, 2004 9:54 AM

To: Gallion, Theresa

Subject: FW: Hildebrandt v. Hyatt Deposition Dates

Theresa:

Your threatening email sent this morning is incorrect. As set forth below, I told Natalie I opposed your belated request for an extension, but I was willing to discuss it - just not on Friday evening. You have never responded to discuss it or to give a reason. I am available for discussion as my schedule allows. Feel free to file the motion, if that is the way you wish to proceed.

Bob Steinberg

Robert A. Steinberg
Waite, Schneider, Bayless & Chesley Co., L.P.A.
1513 Fourth & Vine Tower
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WAITE, SCHNEIDER, BAYLESS & CHESLEY CO., L.P.A.

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Robert A. Steinberg

Fax (513)
381-2375
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FACSIMILE TRANSMITTAL SHEET

DATE: March 5, 2003

TO: Theresa M. Gallion, Esq. (407)541-0887
Natalie J. Storch, Esq.

FROM: Robert A. Steinberg, Esq.

NO. of PAGES: 16 (including cover sheet)

SUBJECT: Hildebrandt v. Hyatt Hotels Corp., Case No. C-1-02-003, S.D. Ohio

Attached please find our economic expert's report.

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Telecopied by: meh

